

**Before the
Federal Communications Commission
Washington, D.C. 20554**

IN THE MATTER OF)	
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<i>Telephone Number Portability</i>)	CC Docket No. 95-116
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**COMMENTS OF THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NEBRASKA ¹**

The Nebraska Public Service Commission (NPSC) generally supports the proposal set forth in the North American Numbering Council (NANC) Local Number Portability Report and Recommendation filed in response to the Federal Communications Commission’s Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 23697 (2003). However, due to the significant number of rural carriers operating within Nebraska, the NPSC makes the following general comments:

It is undisputed that rural carriers serve a smaller customer base and therefore, the per customer costs associated with any changes in hardware, software, and carrier processes and procedures are higher than carriers serving more densely populated areas. Therefore, reducing the porting interval may place an unjustified economic burden on some rural carriers and ultimately their customers.

Due to the unique circumstances of rural carriers, the NPSC recommends:

Nebraska Public Service Commission, P.O. Box 94927, Lincoln, NE 68509.

1. That the industry use a standardized format and data content to initiate a port;
2. That rural carriers be allowed to seek a waiver to exchange the Local Service Request (LSR) data and Firm Order Confirmation (FOC) using a manual process;
and
3. That should a shorter porting interval be adopted, and a mechanized process be required to achieve that interval, state commissions be delegated authority to grant rural carriers a suspension of the requirement through a process similar to that currently in place with respect to the basic LNP requirements.